



**Phillips Lytle** LLP

**Via ECF**

November 15, 2018

Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
50 Pearl St., Courtroom 14A  
New York, NY 10007-1312

Re: Eastern Profit Corporation Limited v. Strategic Vision US, LLC,  
Civil Action No. 18-cv-2185

Dear Judge Koeltl:

We represent defendant-counterclaim plaintiff, Strategic Vision US, LLC ("Strategic Vision"), in the above-referenced matter. We respectfully request an extension of the deadline to complete discovery in this matter to February 28, 2019. The deadline is currently set as December 28, 2018 (*see* ECF Doc. No. 42.) With the addition of Guo Wengui ("Mr. Guo") as a counterclaim defendant and his likely motion to dismiss (which will not be fully briefed until January 14, 2019), we respectfully submit that additional time is necessary to complete discovery.

This is the first request to extend the deadline to complete discovery. Counsel for plaintiff and Mr. Guo each consent to this request. In accordance with Your Honor's Individual Practices, enclosed is a proposed revised scheduling order, which takes into account the proposed extended discovery deadline.

Respectfully submitted,

Phillips Lytle LLP

By /s/ Heather H. Kidera

Heather H. Kidera

cc: Counsel of Record (by ECF)  
Enclosure  
Doc #05-51420

ATTORNEYS AT LAW

340 MADISON AVENUE 17TH FLOOR NEW YORK, NY 10173-1922 PHONE 212 759 4888 FAX 212 308 9079

NEW YORK: ALBANY, BUFFALO, CHAUTAUQUA, GARDEN CITY, NEW YORK, ROCHESTER | WASHINGTON, DC | CANADA: WATERLOO REGION | PHILLIPSLYTLE.COM